

ORIGINAL

Michael Torres Jaimes #82661-198  
In Pro Per  
Federal Correctional Facility Terminal Island  
1299 Seaside Avenue  
Box 3007  
San Pedro, CA

FILED IN THE  
UNITED STATES DISTRICT COURT  
DISTRICT OF HAWAII

OCT 15 2007  
at 10 o'clock and 0 min AM  
SUE BEITIA, CLERK

Defendant In Pro Se

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,

Plaintiff,

v.

CASE No.: CR 03-00501-SOM

MICHAEL TORRES JAIMES,

Defendant.

---

MOTION FOR ADDITIONAL TIME  
TO FILE SUPPLMENTAL BRIEFING  
IN PETITIONER'S 28 U.S.C.2255

---

IF IT PLEASE THIS HONORABLE COURT:

Petitioner can not properly respond to this Honorable Courts Supplemental Briefing Schedule, ordered on September 10, 2007, to be filed by October 8, 2007.

Petitioner would attempt to meet and confer, and stipulate with the Government, but does not have those facilities available to him, being a prisoner at a Federal Correctional Institution, Terminal Island, CA.

---

U.S. v. Michael Torres Jaimes  
MOTION TO VACATE, SET ASIDE, OR CORRECT  
SENTENCE BY A PERSON IN FEDERAL CUSTODY

Petitioner has been blessed, with the opportunity after much search, to be availed with some help, through a Post Conviction Project administered by Freedom for Victims Foundation, a public service non-profit focused on exposing misdeeds and wrongdoing to the general public, such as Elder Fraud, and the like.

Through Petitioners work with Meditation and Yoga, he has had the opportunity to become acquainted with the volunteers in this organization, who have witnessed Petitioners commitment to rehabilitate and live a life of service to others. This exemplifies itself through teaching and listening. Freedom for Victims, have agreed a week ago, to help with research, which is outlined forthwith.

Given the vissitudes of the library and other amenities, it appears that an additional month would be needed to finalize the research, and gathering of documents, as well as completing the interview of witnesses that were waiting to testify on Petitioners behalf, at trial, and were present expecting to testify, in what would have been very dramatic information.

Given, my current practice of mindfullness and conscious truth telling, I will not bore the court with conjecture and rederrick. I will attempt to enumerate with Declarations and fact, what would have occurred, were I not so afraid of cooperating with my counsel.

“A defendant simply cannot be expected to cooperate with attorneys he reasonably believes are working behind his back to undermine his defense”.

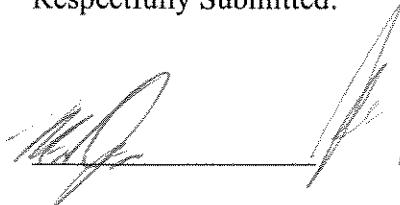
Judge Betty B. Fletcher, wrote in US. V. Hamilton. I will present information from witnesses that were not interviewed, as well as their description of what they would have attested to. I will present information that will lead this Honorable Court, for serious reconsideration.

Freedom for Victims Foundation (can be contacted through [www.freedomforvictims.org](http://www.freedomforvictims.org)), has only recently started with research, and compilation of Transcripts. They have tried to include a

Declaration with this Application, attesting to their work and commitment. Their volunteers requested an additional 60 days, but Petitioner is hopeful to finalize within 45 days from October 8, 2007.

Given the short fuse on this, it appears clear that more time is needed and is hereby requested from this court.

Respectfully Submitted:



10-4-07